

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
vs.)	No. 4:11 CR 404 HEA/FRB
)	
DOUGLAS PENNOCK,)	
)	
Defendant.)	

**DEFENDANT'S MOTION FOR ALLOWANCE
TO TRAVEL OUTSIDE OF THE DISTRICT**

Comes now defendant, Douglas Pennock, by and through counsel, Sean M. Vicente, Assistant Federal Public Defender, and moves this Court to allow the defendant to travel outside the district on May 25th through May 27th of 2012. In support of this motion, defendant states as follows:

1. The defendant is currently on \$10,000 unsecured bond and is being supervised by the Pretrial Services Office in the Central District of Illinois. Mr. Pennock was released in October of 2011 and has had no Pretrial violations. With the Court's permission, Mr. Pennock previously traveled outside the district and complied with all travel restrictions.

2. The defendant requests allowance to travel to the Northern District of Illinois to participate in a business meeting in Indianapolis, Indiana. Counsel for the defendant has provided all relevant information, including where the defendant will be spending the night to Mr. Shae Rucker of the Pretrial Services Officer here in this district.

3. Defendant's counsel has spoken with the assigned prosecutor, Mr. John Bodenhausen, and he does not object to Mr. Pennock's proposed travel plans.

4. Defendant realizes the serious nature of the charges and potential penalties but considering his pretrial compliance thus far combined with his absence of prior convictions he prays the court to allow him to travel outside the jurisdiction for the above noted activity.

WHEREFORE, Defendant Douglas Pennock prays the Court to allow travel outside the jurisdiction on the above noted dates.

Respectfully submitted,

/s/Sean M. Vicente

SEAN M. VICENTE

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2012 the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon John Bodenhause Assistant United States Attorney.

/s/Sean M. Vicente

SEAN M. VICENTE

Assistant Federal Public Defender